

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 07/27/95 Time start 1000 Time finish 1200
Name of Inspector Jim Grabusky
Company, installation name Universal Friction Composites
Location 123 E Stiegel St
County Monheim PA 17545 Municipality Monheim Twp
Identification number PA0003015328
Name of responsible official _____
Title _____
Mailing Address _____
Area code and telephone number 717 664 5336
Name of person interviewed Jamie Showers
Title Product Development Engineer
Mailing address (if different from above) _____
Area code and telephone number _____

1. Current waste handling method:

- | | | | | |
|-------------------------------------------------|-------------------------------------|-----------------------------------|----------------------------------------------|----------------------------------|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. 2000 kg./mo.
b. _____ kg./yr.

Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
1039/0006/0040	Safety Kleen	TSD West Chester PA
001/FO05	Safety Kleen	TSD Linden NJ
001/0021	Remtech Envir	TSD Lewisberry NJ
0005/0035		

Source Reduction: ☐ accomplished, ☐ proposed, ☒ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART B**

Site Name University of Friction ^{Composites} ID Number PAD 003 015 328 Date 07/27/95

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
X				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
X				PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
		X		Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
		X		Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
		X		Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
		X		Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
				a). All containers of haz. waste in good condition	265.171	H016
				b). Containers compatible with hazardous waste being stored within	265.172	H017
				c). Containers of hazardous waste kept closed	265.173(a)	H018
				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
				h). Proper containment and collection system(s)	265.178	H023
				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
		X		On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

Hazardous Waste Inspection Report

Generators - Part B

1-No Violation Observed

2-Not-Applicable

3-Not-Determined

4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Records retained at designated location for 20 years	262.40(a)	H026
X				Quarterly reports submitted to the Department	262.41(a)	H027
X				Exception reporting procedures followed	262.42	H028
X				Hazardous waste disposal plan, if required	262.45	H029
	X			Spill reporting procedures followed	262.46(a)	H030
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	X			Special requirements followed for international shipments	262.50, .53, .55, .60	H032
			X	Source reduction strategy prepared and available	262.80	H033

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

Generator Name Universal Friction Composites
Date 07/27/95

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

1 = No Violation Observed 2 = Not Applicable 3 = Not Determined 4 = Non-Compliance

Chapter Citation 25 Pa Code	Requirement GENERAL PROVISIONS	Status				Line Number
		1	2	3	4	
287.6	Designated facility: valid permit? Permit Number (PA) _____	X				3001
287.52(a)	Biennial report submitted by March 1 of each odd numbered year.	X				3002
287.53	Written source reduction strategy on file and in effect.	X				3003
287.53(b)	Waste reduction strategy covers all waste streams.	X				3004
287.53(c)	Reduction strategy updated every five years or when waste or manufacturing process changes.	X				3005
287.54	Waste analysis performed: copy on file.	X				3006
287.54(b, f)	Annual analysis or certification of waste submitted to Department and designated facility.	X				3007
287.55	Small quantity generator record keeping requirements.	X				3008
287.101(a)	Operation of disposal or processing facility without a permit.	X				3009
	STORAGE REQUIREMENTS					
299.111(1)	Residual waste not mixed with hazardous waste.	X				3010
299.111(2)	Waste stored as not to create a safety risk.	X				3011
299.111(3)	Residual waste not mixed with special handling waste.	X				3012
299.111(4)	Waste not blown or otherwise deposited outside storage area.	X				3013
299.112(c)	Storage area inspected; records available.			X		3014
299.113(a)	All waste stored less than one year.	X				3015
299.114(a)	Equipment maintained in operable condition.	X				3016
299.114(c)	Equipment cleaning frequencies maintained.	X				3017
299.115	Vectors controlled and public nuisances prevented.	X				3018
299.116(a)(b)	Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.	X				3019
299.116(c)	Waste stored to prevent groundwater degradation.		X			3020
299.121	Sufficient number of properly constructed storage containers.		X			3021
299.122	Storage tank design standards.		X			3022
299.112(d), 299.131(b)	No putrescible waste or liquid waste stored in piles.		X			3023
299.131	Waste storage pile area properly designed, constructed and maintained.		X			3024
299.132	Storage pad or liner system properly designed and maintained.		X			3025
299.133	Proper design and maintenance of leachate and runoff control systems.		X			3026
299.151	Proper storage and containment of incinerator ash residue.		X			3027
299.152	Proper storage and containment of friable asbestos containing waste.	X				3028
299.153	Proper storage and containment of coal ash.		X			3029
299.154	Proper storage and containment of PCB containing waste material.		X			3030

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Identification Number : PAD003015328
Company/Facility/Site Name : Universal Friction Composites
Date of Inspection : 07/27/1995

On Jul. 27, 1995, I conducted a follow up inspection of the facility with Jamie Showers. The facility manufactures brake pads and other friction products, some of which contain asbestos.

The two unlabeled drums of hazardous waste (noted in the Departments 06/19/1995 inspection) located near mixing equipment were properly labeled while I was on site.

Through discussion with Jamie Showers and observation of dust collectors on site, it has been determined that the potential for asbestos fibers have a limited potential to escape through the collection bags. A sample to determine the percent asbestos in the dust was not necessary.

Hazardous and residual waste paperwork were reviewed.

- Documentation on employees who received training on hazardous waste was not available. The last time Jamie Showers received training was in 1993.
- A hazardous waste Source Reduction Strategy not available on site.

The following recommendations were noted in the Departments 06/19/1995 inspection and were not completed. :

- 1) Ensure all employees who handle hazardous waste receive the appropriate training in accordance with section 262.34 (a)(5). Documentation of the training should be available on site within 30 days of the inspection on 06/19/1995.
- 2) Prepare a Source Reduction Strategy in accordance with section 262.80 of the Hazardous Waste Regulations within 45 days of the inspection on 06/19/1995.

The "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the report. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve as a formal notification of any violations which were observed during the inspection. Violations may be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations noted herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violations noted herein.

The signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Interviewed (Signature) M. Led Date 08/03/95
(Signature) Jamie Showers Date 08/03/95

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENTHAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 06/19/95 Time start 1000 Time finish 1500
 Name of Inspector Jim Grabusky
 Company, installation name Universal Friction Composites
 Location 123 E Stiegel St
 County Manheim PA 17545 Municipality Manheim Twp
 Identification number PA0003015328
 Name of responsible official _____
 Title _____
 Mailing Address _____
 Area code and telephone number 717 664 5336
 Name of person interviewed Jamie Showers
 Title Product Development Engineer
 Mailing address (if different from above) _____
 Area code and telephone number _____

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 2000 kg./mo.
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
0039/0006/0040	Safety Kleen	TSD west Chesom PA
0001/FO05	Safety Kleen	TSD Linden NJ
0001/0021	Remtech Envir	TSD Lewisberry NJ
FO05/0035		

4. Source Reduction: ☐ accomplished, ☐ proposed, ☒ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Name Universal Friction Composites ID Number PAD003015328 Date 06/19/95

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
2	3	4				
				Hazardous waste determination, performed on all waste streams	262.11	H001
				Identification number	262.12	H002
				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
				PA manifest used for intrastate shipments	262.20(b)	H005
				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
				Manifests filled out properly and completely	262.20(g)	H007
				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
	X			Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
	X			Shipping containers marked and labeled according to U.S. DOT	262.30(2)	H010
	X			Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
	X			Placards offered to transporter	262.33	H012
				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
		X		Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
				a). All containers of haz. waste in good condition	265.171	H016
				b). Containers compatible with hazardous waste being stored within	265.172	H017
				c). Containers of hazardous waste kept closed	265.173(a)	H018
				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
	X			e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
	X			h). Proper containment and collection system(s)	265.178	H023
	X			Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
	X			On the job or classroom personnel training program as per 265.16	265.241-242	

Hazardous Waste Inspection Report

Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Records retained at designated location for 20 years	262.40(a)	H026
X				Quarterly reports submitted to the Department	262.41(a)	H027
X				Exception reporting procedures followed	262.42	H028
X				Hazardous waste disposal plan, if required	262.45	H029
	X			Spill reporting procedures followed	262.46(a)	H030
			X	Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	X			Special requirements followed for international shipments	262.50,.53, .55, .60	H032
X			X	Source reduction strategy prepared and available	262.80	H033

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

Generator I.D. # PAD0003015328 Telephone # ()
Site Name SEE Attached Pg # 2 Operator Name
Site Address Address
Municipality County
Responsible Official Title
Person Interviewed Title
Inspector Time

Inspection Date 06/19/95 Inspection Type 01 Inspector I.D. # 2336 # Violation 02

INSPECTION TYPE

- | | | |
|--------------------|------------------|---------------|
| 01 Routine | 04 Follow Up | 07 Complaint |
| 02 Spill Response | 05 Sampling Only | 08 Record Rev |
| 03 Remedial Action | 06 Ground Water | 09 Other |

Comment

Waste Description: Asbestos / Baghouse Dust Waste Code:
Treatment ☐ Yes ☒ No Type
Type of Storage: ☒ Containers Tanks Piles Impoundments
Disposition: Destination Facility CCSWA Lancaster Landfill
Location Rt 322 Honeybrook PA Type
Amount Generated: lb./mo.

Waste Description: Plant trash Waste Code:
Treatment ☐ Yes ☒ No Type
Type of Storage: ☒ Containers Tanks Piles Impoundments
Disposition: Destination Facility CCSWA
Location Rt 441 Berwynbridge PA Type
Amount Generated: lb./mo.

Waste Description: Waste Code:
Treatment ☐ Yes ☐ No Type
Type of Storage: Containers Tanks Piles Impoundments
Disposition: Destination Facility
Location Type
Amount Generated: lb./mo.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

Generator Name Universal Friction Composites
Date 06/19/95

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

1 = No Violation Observed 2 = Not Applicable 3 = Not Determined 4 = Non-Compliance

Chapter Section Pa Code	Requirement	Status				Line Number
		1	2	3	4	
GENERAL PROVISIONS						
6	Designated facility: valid permit? Permit Number (PA) _____	X				3001
52(a)	Biennial report submitted by March 1 of each odd numbered year.				X	3002
53	Written source reduction strategy on file and in effect.	X				3003
53(b)	Waste reduction strategy covers all waste streams.			X		3004
53(c)	Reduction strategy updated every five years or when waste or manufacturing process changes.	X				3005
54	Waste analysis performed: copy on file.	X				3006
54(b, f)	Annual analysis or certification of waste submitted to Department and designated facility.	X			X	3007
55	Small quantity generator record keeping requirements.	X				3008
101(a)	Operation of disposal or processing facility without a permit.	X				3009
STORAGE REQUIREMENTS						
11(1)	Residual waste not mixed with hazardous waste.	X				3010
11(2)	Waste stored as not to create a safety risk.	X				3011
11(3)	Residual waste not mixed with special handling waste.	X				3012
11(4)	Waste not blown or otherwise deposited outside storage area.	X				3013
12(c)	Storage area inspected; records available.			X		3014
13(a)	All waste stored less than one year.	X				3015
14(a)	Equipment maintained in operable condition.	X				3016
14(c)	Equipment cleaning frequencies maintained.	X				3017
5	Vectors controlled and public nuisances prevented.	X				3018
6(a)(b)	Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.	X				3019
6(c)	Waste stored to prevent groundwater degradation.	X				3020
1	Sufficient number of properly constructed storage containers.	X				3021
2	Storage tank design standards.	X				3022
1(d)	No putrescible waste or liquid waste stored in piles.	X				3023
	Waste storage pile area properly designed, constructed and maintained.		X			3024
	Storage pad or liner system properly designed and maintained.		X			3025
	Proper design and maintenance of leachate and runoff control systems.		X			3026
	Proper storage and containment of incinerator ash residue.		X			3027
	Proper storage and containment of friable asbestos containing waste.			X		3028
	Proper storage and containment of coal ash.		X			3029
	Proper storage and containment of PCB containing waste material.		X			3030

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Identification Number : PAD003015328
Company/Facility/Site Name : Universal Friction Composites
Date of Inspection : 06/19/1995

On Jun. 19, 1995, Barry Sweger (WQ), Bill Weaver (AQ), Tony Rathfon (WM) and myself conducted a joint inspection of the facility with Jamie Showers. The facility manufactures brake pads and other friction products, some of which contain asbestos.

Raw materials are mixed with a solvent. Solvent vapors are collected and recovered for reuse. On occasion more solvent is recovered than can be reused. The excess solvent is shipped off as a waste. The mixed material is rolled out to sheets and dried. Cut off sides of the sheets are collected and placed back into the mixer.

Asbestos and fiberglass are rolled into sheets and a rubber cement is applied. A solvent is used to clean the equipment. The solvent is collected for reuse. In this area there was one partially filled, unlabeled metal 55 gallon drum and one unlabeled plastic container (approximately 30 gallons) of an unknown material.

Dust collectors are located throughout the plant. The dust is collected in large white bags. During a phone conversation on 06/21/95 Jamie Showers stated that two of the dust collectors contain asbestos. A sample will be taken to determine the percent asbestos in the dust.

Two unlabeled drums of hazardous waste were located near mixing equipment. The waste is generated from the line cleaning of the equipment.

Hazardous and residual waste paperwork were reviewed.

Documentation on employees who received training on hazardous waste was not available. The last time Jamie Showers received training was in 1993.

A Preparedness, Prevention and Contingency plan was not available on site. Jamie Showers stated one was completed, but could not be located.

A hazardous waste Source Reduction Strategy not available on site.

A residual waste biennial report was completed for 1992, but not for 1994.

"Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the report. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve as a formal notification of any violations which were observed during the inspection. Violations may be corrected upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations observed herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violations noted herein.

The signature of the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was made of the report with the person.

Interviewed (Signature) Ma. led Date 06/26/95
Signature Jamie Showers Date 06/26/95

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Identification Number : PAD003015328
Company/Facility/Site Name : Universal Friction Composites
Date of Inspection : 06/19/1995

RECOMMENDATIONS:

- 1) Properly label all containers of hazardous waste to accurately identify its contents in accordance with section 265.173(c) of the Hazardous Waste Regulations within 10 days of the inspection on 06/19/1995.
 - 2) Ensure all containers of hazardous waste are properly marked with the appropriate accumulation date in accordance with section 265.34(a)(4) of the Hazardous Waste Regulations within 10 days of the inspection on 06/19/1995.
 - 3) Ensure that containers of hazardous waste are stored within a secondary containment and collection system in accordance with section 265.178 of the Hazardous Waste Regulations within 10 days of the inspection on 06/19/1995.
 - 4) Ensure all employees who handle hazardous waste receive the appropriate training in accordance with section 262.34 (a)(5). Documentation of the training should be available on site within 30 days of the inspection on 06/19/1995.
 - 5) Prepare a Preparedness, Prevention and Contingency plan in accordance with section 262.46(e) of the Hazardous Waste Regulations within 30 days of the inspection on 06/19/1995.
 - 6) Prepare a Source Reduction Strategy in accordance with section 262.80 of the Hazardous Waste Regulations within 45 days of the inspection on 06/19/1995.
 - 7) Complete and submit to the Department the residual waste generators 1994 biennial report in accordance with section 287.52 (a) of the Residual Waste Regulations within 30 days of the inspection on 06/19/1995.
 - 8) Ensure the residual waste reduction strategy covers all residual waste streams in accordance with section 287.52 (a) of the Residual Waste Regulations within 30 days of the inspection on 06/19/1995.
- Submit analysis or certification of residual wastes to the Department in accordance with section 287.54(b)(f) of the Residual Waste Regulations within 30 days of the inspection on 06/19/1995.

WITH THIS REPORT:

Compliance Materials for Generators of Residual Waste booklet.

"Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the report. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements. This inspection report is official notification that a representative of the Department of Environmental Resources, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve as a formal notification of any violations which were observed during the inspection. Violations may be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations observed herein and listing any additional violations. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violations noted herein. The signature of the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was provided to the person.

Interviewed (Signature) Mailed Date 06/26/95

Signature Jamie Stratusky Date 06/26/95

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Identification Number : PAD003015328
Company/Facility/Site Name : Raymark Friction *UNIVERSAL FRICTION COMPOSITES*
Date of Inspection : 05/24/1995

On May 24, 1995, Tony Rathfon and myself conducted a follow up inspection of the facility's old hazardous waste landfill with Jamie Showers of Universal Friction Composites.

Violations noted in the Departments 08/16/1995 inspection report were not corrected.

There are three main sections to the hazardous waste landfill. One, a center portion capped with macadam. Two, an exposed portion adjacent to railroad tracks, and a third section covered with soil and vegetated. Waste was eroding from the uncovered portion of the landfill over silt fences. The eroded waste extended adjacent to railroad tracks and joined with surface water diverted from the macadam capped portion of the landfill.

There were gullies located on the section of the landfill that is covered with soil and vegetated. A section of the side slope of the landfill was eroded and waste was being transported onto and across an access road.

ictures were taken

RECOMMENDATIONS:

- 1) Implement closure activities as per Raymark's approved plan.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations noted herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) Ma. led Date 06/08/95

Inspector (Signature) [Signature] Date 06/08/95